

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

JULIUS MYERS,

Plaintiff,

v.

CASE NO: 2:15-cv-11590
HON: ROBERT H. CLELAND
MAG.: R. STEVEN WHALEN

CITY OF JACKSON, MATTHEW BEARD,
P. GROSS, in their individual and
official capacities,

Defendants.

CHRISTOPHER TRAINOR & ASSOCIATES CHRISTOPHER J. TRAINOR (P42449) AMY J. DEROUIN (P70514) SHAWN C. CABOT (P64021) Attorneys for Plaintiffs 9750 Highland Road White Lake, MI 48386 (248) 886-8650 shawn.cabot@cjtrainor.com	PLUNKETT COONEY AUDREY J. FORBUSH (P41744) Attorney for Defendants 111 E. Court Street, Ste. 1B Flint, MI 48502 810-342-7014 810-232-3159-fax aforbush@plunkettcooney.com
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STIPULATED PROTECTIVE ORDER

At a session of said Court
held in the City of Detroit,
County of Wayne, State of Michigan
on _September 28, 2015.

**PRESENT: HONORABLE ROBERT H. CLELAND
UNITED STATES DISTRICT COURT JUDGE**

THIS MATTER having come before this Honorable Court upon stipulation of the parties, through their respective counsel, and the Court being otherwise fully advised in the premises:

IT IS HEREBY ORDERED that (1) any citizen complaints filed against Defendants Matthew Beard and P. Gross; (2) the complete personnel files of Defendants Matthew Beard and P. Gross without personal information including, but not limited to, addresses, social security numbers, and names of family members; (3) policies, procedures, and/or guidelines used to instruct officers on the use of force and taser use and to instruct personnel in the procedures to be followed in carrying out the duties of their job; and (4) any training records of Defendants Matthew Beard and P. Gross regarding use of force and the use of tasers shall be subject to the following conditions:

1. The documents subject to this protective order shall be used solely and exclusively for the purposes of the instant lawsuit and can be used in any and all court filings, judicial proceedings, depositions, alternative dispute resolution proceedings, trial, and/or any other judicially-related proceedings.
2. The documents subject to this protective order shall not be used in or for any other case, proceeding, dispute, or for any commercial, business, or competitive purpose whatsoever.
3. The documents subject to this protective order may be reviewed by Counsel for the parties, Counsels' staff, those individuals associated with the activities cited in subparagraph (1), and such experts and/or consultants as Counsel deems necessary for purposes of this litigation.
4. The documents provided pursuant to this Protective Order may be disclosed only to those individuals and/or entities identified in this protective order and must be used only by those individuals and/or entities identified in this protective order and must only be used for purposes of this litigation.

IT IS FURTHER ORDERED that nothing in this protective order shall prevent a party from filing a Motion for Modification of the Protective Order.

IT IS FURTHER ORDERED that this protective order shall survive and remain in full force and effect until the entry of final judgment (including any appellate proceedings) in this case, whether by settlement or litigation, unless otherwise ordered by the Court.

IT IS FURTHER ORDERED that the documents produced under this protective order do not constitute an admission and/or agreement that any such document is admissible as evidence in this case. Determinations of evidence admissibility will be made by the Court in a separate proceeding.

IT IS FURTHER ORDERED that the documents produced pursuant to this protective order shall be destroyed by Plaintiff's and/or Defendants' Counsel after final disposition (including all appeals) of the case except any documents attached to any pleadings filed with the court, deposition exhibits, or other pleadings.

s/Robert H. Cleland

HONORABLE ROBERT H. CLELAND

We stipulate to entry of the above Order:

s/Amy J. DeRouin

AMY J. DEROUIN (P70514)

Attorney for Plaintiff

s/Audrey J. Forbush w-consent

AUDREY J. FORBUSH (P41744)

Attorney for Defendants